

Exhibit “L”

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6 Attorneys for Defendant,
Patrick M. Byrne
7

8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

10 ROBERT HUNTER BIDEN,
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12 Plaintiff,
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14 vs.
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16 PATRICK M. BYRNE
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18 Defendants.
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Case No.: 2:23-CV-09430-SVW-PD
Judge: Honorable Stephen V. Wilson
Courtroom "10A"

**"HIGHLY CONFIDENTIAL AND TO BE
FILED UNDER SEAL PURSUANT TO
STIPULATION FOR PROTECTIVE
ORDER DATED AUGUST 9, 2024"**

**REVISED DECLARATION OF PATRICK
BYRNE PER THE COURT'S IDC ORDER
DATED SEPTEMBER 30, 2024**

Hearing Date: October 4, 2024
Hearing Time: 9:00 a.m.
Location: U.S. Courthouse
255 E. Temple St, 5th Floor
Los Angeles, CA 90012
Courtroom 580

1 I, Patrick Byrne, declares as follows:

2 1. I am over eighteen years of age and the sole party defendant in this action. I am
3 personally familiar with the facts set forth in this declaration and if called upon I could and
4 would competently testify to the foregoing.

5 2. During 2024, I became engaged in activities which resulted in my obtaining
6 confidential information from the Venezuelan government computers. The government of
7 Venezuela discovered by activities and President Maduro of Venezuela mentioned my activities
8 on national television in Venezuela.

9 3. In August of 2024, I was engaged in exclusive travel and was at the moment in
10 Ghana cooperating with Emanuel Mann who is an official with the Ghanian Ministry of Security
11 and on a criminal matter. He warned me that they were receiving information that a number of
12 war criminals in West Africa were cooperating to get me in a position where I could be
13 kidnapped and taken to a third world country.

14 4. In addition to receiving word from Emanuel Mann of the Ghanian Ministry of
15 Security on my potential kidnapping, I also learned that Venezuela was attempting to kidnap me
16 and they had a bounty on my head in the sum of \$25,000,000 due to my work that was done to
17 access information from the Venezuelan government. Mr. Emanuel Mann can be reached by
18 telephone at 233 27 776 4550. I was and am very concerned about my personal safety.

19 5. I decided to not return to the United States when I completed my travels. I
20 evaluated returning to the United States and Europe. However, none of the potential locations in
21 Europe and the United States where I could reside including Florida, provided me with a safe
22 place to live without being exposed to either a kidnapping and/or murder. The local police in
23 Europe and the United States cannot provide me with the security I need for my personal safety.
24 I investigated the matter further and decided to reside in Dubai which is located in United Arab
25 Emerites. Dubai is a modern city. It has excellent security for those who reside there. I am easily
26 able to conduct business from Dubai. There is also a major airport in Dubai for travel. I do not
27 plan to return to the United States anytime between now and November 10, 2024. I do not feel
28 safe being in the United States. I cannot project and do not know what I will do after November

1 10, 2024.

2 6. I was informed that counsel for Mr. Biden wants to take my in person deposition.
3 Due to the concerns for my personal safety, I agreed to pay one for one of Mr. Biden's counsel, a
4 court reporter, and a videographer to fly from the United States to Dubai. I agreed to pay for their
5 airfare, lodging, accommodations, ground travel costs, and time to travel including lay over time
6 but not for time spent at my deposition or the day of my deposition that would be covered arising
7 from travel from the United States to Dubai. I also agreed to make the deposition proceeding
8 available by zoom to Mr. Biden and his three other counsel working on this case so that they can
9 attend the deposition for seven hours. I estimated these costs to be between \$70,000.00 and
10 \$80,000.00 and I am prepared to pay them.

11 7. Depositions are taken all of time in Dubai and without any problems. Attached as
12 Exhibit "A" is a copy of the International Depo Guide published by Optima Juris for the taking
13 of depositions in United Arab Emirates in Dubai. Attached as Exhibit "B" is a copy of the Planet
14 Depos brochure for the taking of depositions in Dubai. There are no laws in Dubai that prohibit
15 the taking of depositions in Dubai. As long as the person being deposed has approved it like I
16 have done the deposition can be taken in Dubai.

17 8. It is my understanding that my offer to pay all costs and attorney's fees for one of
18 Mr. Biden's counsel, the court reporter and videographer to travel here to Dubai was rejected.
19 Alternatively, I request that my deposition be taken by zoom. In the Optima Juris publication,
20 they are able to set up depositions by Webcast and can provide the professionals needed to take
21 the deposition. They can receive and set up exhibits in a computer that can be used during the
22 deposition. They also confirm in the publication that a deposition taken in Dubai by Webcast is
23 way more cost effective than an in person deposition.

24 9. I declare under penalty of perjury under the laws of the United States of American
25 that the foregoing is true and correct. This Declaration was executed on September 30, 2024, at
26 Dubai in the United Arab Emirates.

27 *Patrick Byrne*

28 Patrick Byrne

Exhibit “A”



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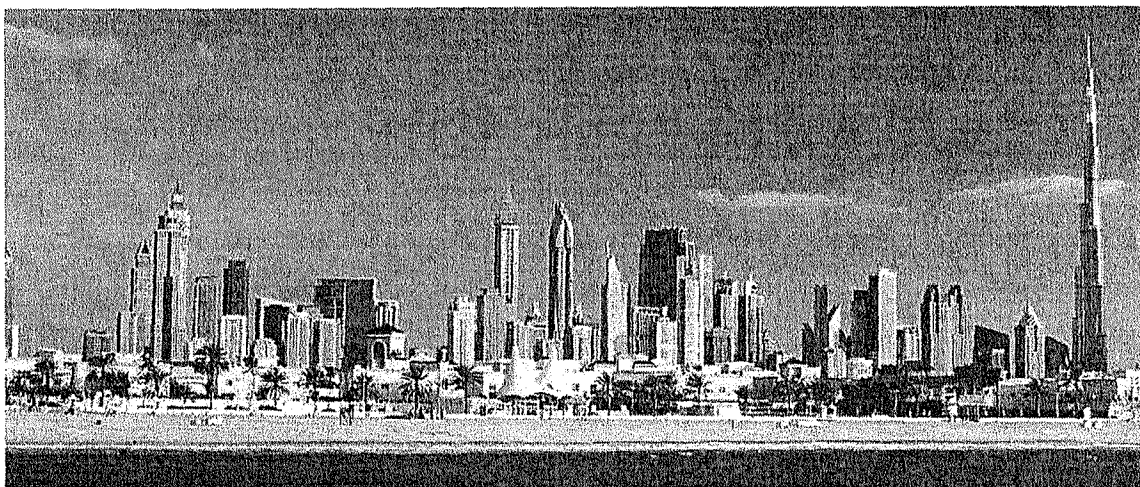
COURT REPORTING IN THE UNITED ARAB EMIRATES

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Planet Depos has teams of court reporters and videographers living around the world, and we often cover depositions and other business meetings in the United Arab Emirates. The UAE does not recognize depositions as we do in the United States, but many U.S. depositions still take place there. We have many years of experience providing deposition and litigation support in the UAE.

Whether you need a court reporter or legal videographer in the UAE, we have one nearby to cover your needs. We can also provide you with modern conference rooms outfitted for your business meetings, whether small or large, with videoconferencing equipment and trained staff to handle any issue.



CONFERENCE ROOMS IN THE UAE

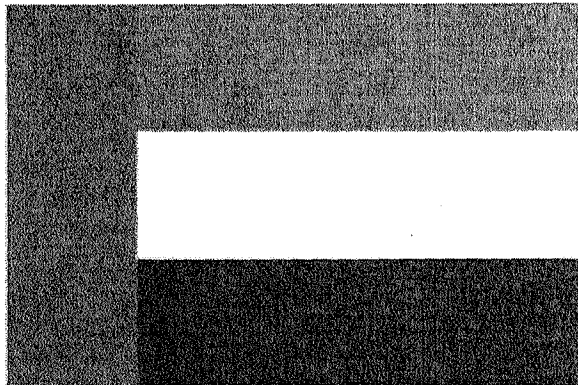
United Arab Emirates is famous for its hotel industry. Dubai offers a stunning selection of world-class hotels, all capable of hosting your depositions or meetings in comfort and style. Conference rooms can be booked in one of these hotels, or an office building. Planet Depos can reserve conference rooms suitable to your needs.

Checklist for Planet Depos Concierge Services:

- Number of rooms needed
- Number of attendees (per room)

- End time
- Food & Beverage
- Additional equipment needed:
 - Projector and screen
 - Speaker phone
 - Videoconferencing
- If reserving multiple days, would you like to keep equipment and documents locked in the conference room overnight?

More Information About United Arab Emirates



Party to The Hague Evidence Convention? No

Currency: UAE Dirham

Time Zone: GMT + 4:00

Airport: Dubai International Airport (DXB)

U.S. Visa Requirements? None

2023 International Deposition Guide

Download Now

Resources & Services

Deposition Checklist

Though the UAE doesn't recognize depositions as we do in the U.S., many still occur. Follow our deposition checklist for straightforward UAE depositions.

[Learn More →](#)

Arbitration

Planet Depos offers cost-effective and reliable realtime, transcription, and related services for arbitrations in the UAE.

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Exhibit “B”



YES! You can schedule court reporters for
depositions or arbitrations in Dubai






SCHEDULE NOW

Scheduling or Questions? Call 1.855.678.4628

[Depo Location > United Arab Emirates > Dubai](#)

Dubai Court Reporters: What you need to know

Before you schedule a court reporter in Dubai, learn more about the rules and regulations regarding U.S. depositions in Dubai.

- | | | | |
|---|--|-----|---|
| 1 | Are there any restrictions on holding a U.S. depo in Dubai? | No |  |
| 2 | Can depositions in Dubai take place at any venue (hotel, conference room, etc.)? | Yes |  |
| 3 | Does a U.S. passport holder need a visa to enter the United Arab Emirates? | No |  |
| 4 | Are there court reporters for U.S. depositions in Dubai? | Yes |  |
| 5 | Can Optima Juris help me set up my depo? | Yes |  |

SCHEDULE NOW



Court reporters

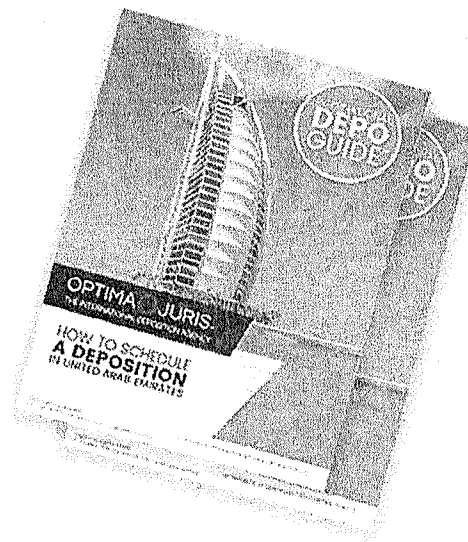
Our trusted court reporters have extensive international experience, along with the know-how to get the job done with the highest-quality results.



Legal videographers

Legal videographers trained in the U.S. Federal Rules of Civil Procedure, so you can be sure that your video record will be taken in a manner consistent with your jurisdiction's requirements.

SCHEDULE NOW



Must-read guide for setting up a depo in Dubai, United Arab Emirates

Our experts have created a complimentary guide every lawyer, paralegal and court reporting agency should read. The International Depo Guide for the United Arab Emirates is a 6-page PDF that covers frequently asked questions, tips on how to swear in a witness abroad, best options for deposing a witness remotely, a user-friendly checklist, and travel tips.

Options for attending your deposition or arbitration

Thanks to better Internet connectivity worldwide, many new options have arisen for conducting a deposition or arbitration anywhere in the world. Below is a reference guide of the different options for your deposition or arbitration in Dubai.



Attending Deposition In Person

Attorneys, court reporter, videographer, and interpreter physically present with the witness.*

Advantages:

Typically this an ideal scenario to get the clearest record and you are less likely to encounter technical issues.

Disadvantages:

Travel costs can add up quickly.



Videoconference Facility

Attorneys participate remotely. Court reporter, videographer, and interpreter physically present with the witness.*

Advantages: Having the court reporter present with the witness is ideal for the clearest record. You can save on travel costs by having the attorneys participate remotely.

Disadvantages: Some travel costs may incur for the court reporter, although our goal is always to find the closest court reporter to your witness.

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GET QUOTE

*For the best and clearest record we always recommend that the court reporter, videographer and interpreter be physically present with the witness.



the highest quality deposition services abroad. We stand by our services 100% and most importantly, we take away the anxiety of scheduling an international depo.

Ian Hardy
CEO/Founder



Optima Juris' 100% Peace of Mind Guarantee*

At Optima Juris we are committed to providing you with the very best deposition services abroad without the stress or hassle. We guarantee that your court reporter and deposition team will show up on-time, where instructed, and that the results (transcript, video, interpretation, etc.) will be at the same level you would expect when conducting a deposition in your home town in the States. If that's not the case, we'll refund you fully for the defective service, no questions asked. This guarantee is subject to limitations, exclusions, and conditions as outlined in our [terms & conditions](#).

GET TO KNOW US



**Do you have a question about setting up a virtual, hybrid,
or in-person deposition or arbitration? Our experts are
here to help!**

Give us a call 24/7 at 1.855.678.4628.

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